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March 27, 2006

Tonya A. Jacobs
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CM RRR #7005 2570 0000 6689 7226

Mr. L. D. Walker, III
The Walker Law Firm
8650 Minnie Brown Road, Suite 160
Montgomery, Alabama 36117

Re: Civil Action No. 2:05-CV-925-MHT-SRW; Adwowa Jacobs v. Electronic Data
Systems Corporation and Jeff Williams; In the United States District Court for
the Middle District of Alabama, Northern District

Dear Mr. Walker:

Enclosed please find Electronic Data Systems Corporation's First Set of
Requests for Admissions, Interrogatories, and Requests for Production in reference to
the above entitled and numbered cause.

If you have any questions or comments, please do not hesitate to contact me.

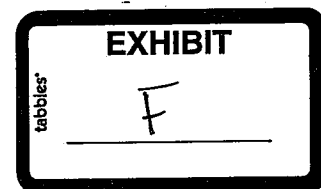
Sincerely,


Tonya A. Jacobs

TAJ/cs
Enclosures

cc: **CM RRR#7005 2570 0000 6689 7233**

✓ Mr. James E. Williams
Melton, Epsy & Williams, P.C.
Post Office Drawer 5130
Montgomery, Alabama 36103-5130



IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ADWOWA JACOBS,	§	
	§	
Plaintiff,	§	
v.	§	CIVIL ACTION NO.
	§	
ELECTRONIC DATA SYSTEMS	§	2:05-CV-925-MHT-SRW
CORPORATION AND JEFF	§	
WILLIAMS,	§	
Defendants.	§	

**ELECTRONIC DATA SYSTEMS CORPORATION'S
FIRST SET OF REQUESTS FOR ADMISSIONS, INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

TO: Adwowa Jacobs, by and through her attorney of record, Mr. L.D. Walker, III, The Walker Law Firm, 8650 Minnie Brown Road, Suite 160, Montgomery, Alabama 36117.

Electronic Data Systems Corporation, Inc. ("EDS"), one of the Defendants in the above-entitled and numbered cause, serves the following Requests for Admissions, Interrogatories and Requests for Production, to which Plaintiff shall respond in accordance with the Federal Rules of Civil Procedure. Plaintiff must answer each Request for Admission, Interrogatory and/or Request for Production separately. Plaintiff must deliver her written responses, as well as responsive documents, to counsel for EDS within thirty (30) days of service of same to Baker & Hostetler LLP, 1000 Louisiana, Suite 2000, Houston, Texas 77002-5009.

Respectfully submitted,

BAKER & HOSTETLER LLP

Dated: March 21, 2006

By: 

Tonya A. Jacobs
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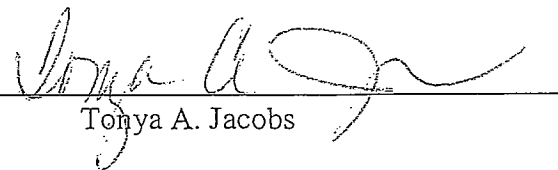
ATTORNEYS FOR DEFENDANT ELECTRONIC
DATA SERVICES CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2006, a true and correct copy of the foregoing document has been served on the following counsel of record, via Certified Mail, return receipt requested:

L. D. Walker, III
The Walker Law Firm
8650 Minnie Brown Road, Suite 160
Montgomery, Alabama 36117

James E. Williams
Melton, Epsy & Williams, P.C.
Post Office Drawer 5130
Montgomery, Alabama 36103-5130


Tonya A. Jacobs

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that you have not incurred and are not seeking to recover in this lawsuit any past or future medical expenses as a result of the alleged conduct of the Defendants as set forth in your Complaint.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that you have not been treated by a psychologist, psychiatrist, doctor, or medical professional as a result of the alleged conduct of the Defendants as set forth in your Complaint.

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that at all times during your employment with EDS, you have been an at-will employee.

RESPONSE:

REQUEST FOR ADMISSION NO. 4: Admit that you do not have a contract to be employed with EDS for any length of time.

RESPONSE:

REQUEST FOR ADMISSION NO. 5: Admit that you are currently employed by EDS.

RESPONSE:

REQUEST FOR ADMISSION NO. 6: Admit that you have not been harassed because of your gender.

RESPONSE:

REQUEST FOR ADMISSION NO. 7: Admit that you have not suffered a substantial detrimental effect on your employment or your psychological well-being, as a result of any conduct of Defendants.

RESPONSE:

REQUEST FOR ADMISSION NO. 8: Admit that you have not been treated for or diagnosed with severe emotional distress, mental anguish, anxiety, stress, humiliation, inconvenience, and/or loss of enjoyment of life.

RESPONSE:

REQUEST FOR ADMISSION NO. 9: Admit that neither EDS nor Williams engaged in extreme and/or outrageous conduct toward you.

RESPONSE:

REQUEST FOR ADMISSION NO. 10: Admit that neither EDS nor Williams discriminated against you because of your gender.

RESPONSE:

REQUEST FOR ADMISSION NO. 11: Admit that neither EDS nor Williams intentionally and/or recklessly caused you severe emotional distress.

RESPONSE:

REQUEST FOR ADMISSION NO. 12: Admit that neither EDS' nor Williams' actions or inactions constituted a wrongful intrusion into your private life and/or activities.

RESPONSE:

REQUEST FOR ADMISSION NO. 13: Admit that EDS did not intrude into your private life and activities in such a manner as to cause you outrage, mental anguish, shame, and/or humiliation.

RESPONSE:

REQUEST FOR ADMISSION NO. 14: Admit that you have no evidence that EDS intentionally interfered with your interest in solitude and seclusion, either as to your person or private affairs and/or concerns.

RESPONSE:

REQUEST FOR ADMISSION NO. 15: Admit that you have never been subject to unwelcome sexual harassment during your employment with EDS.

RESPONSE:

REQUEST FOR ADMISSION NO. 16: Admit that you reported only one alleged incident of harassment to anyone at EDS.

RESPONSE:

REQUEST FOR ADMISSION NO. 17: Admit that during your employment with EDS, you have not been demoted or docked in pay.

RESPONSE: